

**To:** White, Elizabeth[white.elizabeth@epa.gov]  
**From:** Greenwalt, Sarah  
**Sent:** Mon 4/23/2018 5:44:24 PM  
**Subject:** RE: TIME SENSITIVE: NRDC v EPA FOIA paper records and non-email ESI search needed by 4/27

Thank you Miss Beth.

I have responded to Matthew letting him know that I have searched non-email related records for records relating to the red team/blue team exercise and anything from the Heartland Institute, and did not find anything.

Let me know if you need anything else from me!

**Sarah A. Greenwalt**

U.S. Environmental Protection Agency

Work: 202-564-1722|Cell: 202-816-1388

Greenwalt.Sarah@epa.gov

**From:** White, Elizabeth  
**Sent:** Monday, April 23, 2018 12:20 PM  
**To:** Schwarz, Matthew <Schwarz.Matthew@epa.gov>; Bolen, Brittany <bolen.brittany@epa.gov>; Brown, Byron <brown.byron@epa.gov>; Chmielewski, Kevin <chmielewski.kevin@epa.gov>; Darwin, Henry <darwin.henry@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; Falvo, Nicholas <falvo.nicholas@epa.gov>; Ford, Hayley <ford.hayley@epa.gov>; Greenwalt, Sarah <greenwalt.sarah@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Hale, Michelle <hale.michelle@epa.gov>; Hupp, Millan <hupp.millan@epa.gov>; Kelly, Albert <kelly.albert@epa.gov>; Letendre, Daisy <letendre.daisy@epa.gov>; Lovell, Will (William) <lovell.william@epa.gov>; McMurray, Forrest <mcmurray.forrest@epa.gov>; Morris, Madeline <morris.madeline@epa.gov>; Munoz, Charles <munoz.charles@epa.gov>; Sugiyama, George <sugiyama.george@epa.gov>; Wagner, Kenneth <wagner.kenneth@epa.gov>; Yamada, Richard (Yujiro) <yamada.richard@epa.gov>; Dravis, Samantha <dravis.samantha@epa.gov>

**Cc:** Feeley, Drew (Robert) <Feeley.Drew@epa.gov>; Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>

**Subject:** RE: TIME SENSITIVE: NRDC v EPA FOIA paper records and non-email ESI search needed by 4/27

Hi everyone- I am working closely with Matt on this production so please do not hesitate to contact me if you have questions about what we are asking you to search for.

Thanks,

Beth

**Beth White**

Director, Office of the Executive Secretariat

U.S. Environmental Protection Agency

(202) 564-1781 direct

Ex. 6 - Personal Privacy

cell

**From:** Schwarz, Matthew

**Sent:** Monday, April 23, 2018 11:34 AM

**To:** Bolen, Brittany <bolen.brittany@epa.gov>; Brown, Byron <brown.byron@epa.gov>; Chmielewski, Kevin <chmielewski.kevin@epa.gov>; Darwin, Henry <darwin.henry@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; Falvo, Nicholas <falvo.nicholas@epa.gov>; Ford, Hayley <ford.hayley@epa.gov>; Greenwalt, Sarah <greenwalt.sarah@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Hale, Michelle <hale.michelle@epa.gov>; Hupp, Millan <hupp.millan@epa.gov>; Kelly, Albert <kelly.albert@epa.gov>; Letendre, Daisy <letendre.daisy@epa.gov>; Lovell, Will (William) <lovell.william@epa.gov>; McMurray, Forrest <mcmurray.forrest@epa.gov>; Morris, Madeline <morris.madeline@epa.gov>; Munoz, Charles <munoz.charles@epa.gov>; Sugiyama, George <sugiyama.george@epa.gov>; Wagner, Kenneth <wagner.kenneth@epa.gov>; Yamada, Richard (Yujiro) <yamada.richard@epa.gov>; Dravis, Samantha <dravis.samantha@epa.gov>

**Cc:** White, Elizabeth <white.elizabeth@epa.gov>; Feeley, Drew (Robert) <Feeley.Drew@epa.gov>; Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>

**Subject:** TIME SENSITIVE: NRDC v EPA FOIA paper records and non-email ESI search

needed by 4/27  
**Importance: High**

All-

You have been identified as a custodian likely to have records responsive to FOIA request HQ-2017-011514, which is currently in litigation as *NRDC v. EPA*, No. 1:17-cv-9492 (S.D.N.Y.). In order to demonstrate that EPA conducted a reasonably calculated search, as required by the FOIA, please conduct a search of paper records and non-email electronic records in your possession. This FOIA request, HQ-2017-011514, contains two parts. Part 1 concerns the “red team/blue team” exercise. Part 2 concerns EPA’s Protocol for Office of Affairs of Draft Competitive Grant Solicitations released in August 2017. **This email concerns only Part 1. A separate email will be sent to the Part 2 custodians.** Please complete your search no later than **April 27, 2018** in accordance with the following parameters:

1. FOIA Request: Part 1- “Describe, outline, or relate to the “red team-blue team” exercise ( “the exercise”) announced by EPA Administrator Scott Pruitt in June 2017 as a strategy to test the scientific premise of human-caused climate change and promote public debate, including:
  - a. Origin and development of the exercise;
  - b. EPA resources that have been or will be expended to develop and execute the exercise, including funds and staff allocation, and compensation for members of the red and blue teams;
  - c. Proposed timeline for the exercise including any forum, date(s), or format of proposed public debate or exchange between the red and blue teams;
  - d. Selection criteria for red and blue team members;
  - e. Communications with others inside and outside the federal government regarding this exercise;
  - f. Communications with the Heartland Institute regarding this exercise, including, but not limited to, recruitment for the red team;
  - g. Names and credentials of individuals selected to be red and blue team members, as well as those offered the positions who declined; and
  - h. Records provided to or prepared for members of the red and blue teams.”
2. Date range:
  - a. 1/20/17- 1/18/18
3. Locations to be searched:
  - a. Paper files (including, but not limited to, phone logs, schedules, handwritten notes, etc.);
  - b. Non-email electronically stored information (“ESI”):

- i. OneDrive
  - ii. SharePoint
  - iii. Government Furnished Equipment (“GFE”) computer hard drive(s)
  - iv. Lotus Notes database(s)
  - v. Any other local or shared hard drive(s)
- c. Text messages
- d. Voicemail
- e. External Drive(s) and Disc(s)
- f. Other non-email Agency records in your possession that are likely to be responsive records

While conducting your search, please take notes on your search methods (e.g., type(s) of records, location(s) searched, how you identified responsive records, etc.). After you have completed your search, please scan and email any responsive records located through your search efforts to me. Please also include your notes about your search. If you found no potentially responsive records, please email me to let me know. A few of the custodians on this email are no longer with the Agency, but are included to alert the appropriate folks that the records for those departed employees also need to be searched. The Administrator and Chief of Staff are also custodians for this FOIA request.

Lastly, to conclude your search efforts, please specifically answer the following question:

1. Have you ever used personal email to conduct Agency business related to the red team/blue team exercise?
  - a. If so, please indicate whether you have forwarded such message(s) to your epa.gov account and forward a copy to me.

EPA is obligated by court order to complete its search and review for Part 1 of HQ-2017-011514 by May 14, 2018. Since two weeks are necessary to process and review the documents, **please complete your search and submit any responsive records and search documentation by no later than April 27, 2018.**

Thanks,

Matt Schwarz

Matthew Schwarz

Attorney-Advisor

Office of General Counsel | General Law Office | Information Law Practice Group

U.S. Environmental Protection Agency

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Washington, DC 20460

202-564-5654